

LUM, DANZIS, DRASCO & POSITAN, LLC
103 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 403-9000
(DD2022)(KO9378)
Attorneys for Defendant
Sidley Austin Brown & Wood LLP

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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JOSEPH STECHLER; GAIL STECHLER; and
STECHLER & CO., INC. f/k/a JOSEPH
STECHLER & CO., INC,

Plaintiffs,

- against -

SIDLEY AUSTIN BROWN & WOOD LLP;
R.J. RUBLE; ALPHA CONSULTANTS, INC.;
ALPHA CONSULTANTS, L.L.C.; IVAN ROSS;
IRWIN ROSEN; GRANT THORNTON, L.L.P.;
GRANT THORNTON INTERNATIONAL; ISRAEL
PRESS, REFCO CAPITAL MARKETS, LTD.; and
REFCO CAPITAL LLC,

Defendants.
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Civ. Action No. 05-3485 (HAA)

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
DEFENDANT SIDLEY AUSTIN
BROWN & WOOD, LLP TO
ANSWER OR OTHERWISE
RESPOND TO PLAINTIFFS'
COMPLAINT

WHEREAS Plaintiffs, Joseph Stechler, et. al, filed their original complaint in state court and the matter was removed to Federal Court by Defendant, Sidley Austin, Brown & Wood, LLP ("Brown & Wood"), on July 12, 2005, and

WHEREAS on August 5, 2005 Plaintiffs filed a Motion to Remand this action to state court which is currently pending before the Court; and


WHEREAS, Plaintiffs submitted to Brown & Wood a Request for Waiver of Service of Summons Pursuant to F.R.Civ.P. 4(d) on September 26, 2005;

TOTAL P.05

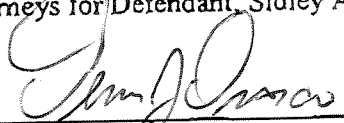
NOW, THEREFORE, it is hereby stipulated and agreed to by and between Plaintiffs and Defendant, Brown & Wood as follows:

1. Brown & Wood waives formal service of process pursuant to F.R.Civ.P. 4(d);
2. The time within which Defendant, Brown & Wood, may answer or otherwise respond to Plaintiffs' Complaint is hereby extended to the later of: (a) sixty (60) days from the date on which Plaintiffs served Brown & Wood with the Request for Waiver of Service of Summons; or (b) forty-five (45) days from the date the Court enters an Order deciding Plaintiffs' pending Motion to Remand.

KANE KESSLER, P.C.
Attorneys for Plaintiffs, Joseph Stechler, et al.

By: 
DANA M. SUSMAN

LUM, DANZIS, DRASCO & POSITAN, LLC
Attorneys for Defendant, Sidley Austin Brown & Wood, LLP

By: 
DENNIS J. DRASCO

DATED: October , 2005

SO ORDERED

HON. MARK FALK, U.S.M.J.

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LUM DANZIS

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